

## **EXHIBIT B**

to

PLAINTIFF'S OPPOSITION TO  
THE UVA DEFENDANTS' MOTION FOR PROTECTIVE ORDER

**From:** Fleming, Eric S. <[EFleming@mcguirewoods.com](mailto:EFleming@mcguirewoods.com)>  
**Sent:** Monday, April 18, 2022 8:31 PM  
**To:** Lockerby, Michael J. <[MLockerby@foley.com](mailto:MLockerby@foley.com)>; Robert Yates <[RYates@ohaganmeyer.com](mailto:RYates@ohaganmeyer.com)>; C. Quinn Adams <[CAdams@ohaganmeyer.com](mailto:CAdams@ohaganmeyer.com)>  
**Cc:** Thompson, Farnaz Farkish <[FThompson@mcguirewoods.com](mailto:FThompson@mcguirewoods.com)>; Howard, Brandi G. <[BHoward@mcguirewoods.com](mailto:BHoward@mcguirewoods.com)>  
**Subject:** Bhattacharya v. Murray: Responses and Objections to 4th Discovery Requests (RFAs)

**\*\* EXTERNAL EMAIL MESSAGE \*\***

Dear counsel,

On behalf of Farnaz Thompson, please find attached Defendants' Objections and Responses to Plaintiff's 4<sup>th</sup> Discovery Requests, specifically the responses to Requests for Admission Nos. 134 through 196. Defendants will supplement with their objections and responses to the relevant Requests for Production and Interrogatories by the end of this week. Best regards,

**Eric S. Fleming**

Associate  
McGuireWoods LLP  
Gateway Plaza  
800 East Canal Street  
Richmond, VA 23219-3916  
T: +1 804 775 1806  
M: +1 757 353 0510  
F: +1 804 698 2306  
[efleming@mcguirewoods.com](mailto:efleming@mcguirewoods.com)  
[Bio](#) | [VCard](#) | [www.mcguirewoods.com](http://www.mcguirewoods.com)



Food & Product Labeling Emergency Hotline: [labelinghotline@mcguirewoods.com](mailto:labelinghotline@mcguirewoods.com) and +1 804 775 7878

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For a good part of the day, I will be in transit between Richmond and Northern Virginia in connection with a hearing in Fairfax County Circuit Court. For a period of time in the afternoon, I will have no cell phone or email access but hope to be available by 3:30 p.m. When I do become available, I will unfortunately be available only by cell phone.

In closing, I apologize for having to bring this matter before the Court on such short notice.

**Michael J. Lockerby**

*Partner*

**Foley & Lardner LLP**

3000 K Street, N.W., Suite 600, Washington, DC 20007-5109

Phone 202.945.6079 | Cell 804.399.6089

[View My Bio](#) | [Visit Foley.com](#) | [mlockerby@foley.com](mailto:mlockerby@foley.com)



**From:** [ecfnoticing@vawd.uscourts.gov](mailto:ecfnoticing@vawd.uscourts.gov) <[ecfnoticing@vawd.uscourts.gov](mailto:ecfnoticing@vawd.uscourts.gov)>

**Sent:** Wednesday, April 13, 2022 3:28 PM

**To:** [vawd\\_ecf\\_nef@vawd.uscourts.gov](mailto:vawd_ecf_nef@vawd.uscourts.gov)

**Subject:** Activity in Case 3:19-cv-00054-NKM-JCH Bhattacharya v. Murray, Jr., et al Order to Respond

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**U.S. District Court**

**Western District of Virginia**

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The following transaction was entered on 4/13/2022 at 3:28 PM EDT and filed on 4/13/2022

**Case Name:** Bhattacharya v. Murray, Jr., et al  
**Case Number:** [3:19-cv-00054-NKM-JCH](#)  
**Filer:**  
**Document Number:** 358(No document attached)

**Docket Text:**

**ORAL ORDER: Plaintiff shall respond to Defendants' motion for protective order, ECF No. 344, no later than April 19, 2022. Defendants may file a reply no later than April 22, 2022. Entered by Magistrate Judge Joel C. Hoppe on 04/13/2022. This Notice of Electronic Filing is the Official ORDER for this entry. No document is attached.(dg)**

**3:19-cv-00054-NKM-JCH Notice has been electronically mailed to:**

Michael J. Lockerby [mlockerby@foley.com](mailto:mlockerby@foley.com)

Harry Robert Yates, III [ryates@ohaganmeyer.com](mailto:ryates@ohaganmeyer.com), [gspringston@ohaganmeyer.com](mailto:gspringston@ohaganmeyer.com),  
[mbatten@ohaganmeyer.com](mailto:mbatten@ohaganmeyer.com), [mwheeler@ohaganmeyer.com](mailto:mwheeler@ohaganmeyer.com)

Melissa Wolf Riley [mwriley@virginia.edu](mailto:mwriley@virginia.edu), [bconley@virginia.edu](mailto:bconley@virginia.edu)

Jonathan Todd Blank [jblank@mcguirewoods.com](mailto:jblank@mcguirewoods.com), [babel@mcguirewoods.com](mailto:babel@mcguirewoods.com),  
[rfitzgerald@mcguirewoods.com](mailto:rfitzgerald@mcguirewoods.com)

Farnaz Farkish Thompson [fthompson@mcguirewoods.com](mailto:fthompson@mcguirewoods.com), [farnazfthompson@gmail.com](mailto:farnazfthompson@gmail.com)

Micah Block Schwartz [mschwartz@mcguirewoods.com](mailto:mschwartz@mcguirewoods.com), [ecarreras@mcguirewoods.com](mailto:ecarreras@mcguirewoods.com),  
[mdugan@mcguirewoods.com](mailto:mdugan@mcguirewoods.com), [mfleming@mcguirewoods.com](mailto:mfleming@mcguirewoods.com),  
[nvonbargen@mcguirewoods.com](mailto:nvonbargen@mcguirewoods.com)

Christopher Quinn Adams [cadams@ohaganmeyer.com](mailto:cadams@ohaganmeyer.com), [skines@ohaganmeyer.com](mailto:skines@ohaganmeyer.com)

Shannon Aileen Temlak [sat@fplegal.com](mailto:sat@fplegal.com)

Evan Tucker [etucker@mcguirewoods.com](mailto:etucker@mcguirewoods.com)

Brandi G. Howard [bhoward@mcguirewoods.com](mailto:bhoward@mcguirewoods.com)

Michael Brody [mbrody@mcguirewoods.com](mailto:mbrody@mcguirewoods.com)

Alicia Marie Penn [apenn@mcguirewoods.com](mailto:apenn@mcguirewoods.com), [MSaad@mcguirewoods.com](mailto:MSaad@mcguirewoods.com)

Brandon Christopher Marx [bmarx@foley.com](mailto:bmarx@foley.com)

Steven Lockhart [slockhart@foley.com](mailto:slockhart@foley.com), [bhodges@foley.com](mailto:bhodges@foley.com)

James G. Munisteri [jmunisteri@foley.com](mailto:jmunisteri@foley.com), [docketflow@foley.com](mailto:docketflow@foley.com), [james-munisteri-0085@ecf.pacerpro.com](mailto:james-munisteri-0085@ecf.pacerpro.com)

John Melko [jmelko@foley.com](mailto:jmelko@foley.com), [john-melko-2781@ecf.pacerpro.com](mailto:john-melko-2781@ecf.pacerpro.com), [rdiep@foley.com](mailto:rdiep@foley.com)

Robert Thomas Slovak [rslovak@foley.com](mailto:rslovak@foley.com)

James Compton [jcompton@mcguirewoods.com](mailto:jcompton@mcguirewoods.com)

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